

Exhibit A**UNITED STATES DISTRICT COURT
DISTRICT OF NEBRASKA**

LAURA A. DUHIGG , an individual, Plaintiff,		Case No.8:15-CV-00091
v.		
GOODWILL INDUSTRIES, INC. a Nebraska nonprofit corporation, Defendant.		PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANT

TO: Goodwill Industries, Inc.
c/o Marcia Washkuhn
Kutak Rock LLP
The Omaha Building
1650 Farnam Street
Omaha, NE 68102
Marcia.washkuhn@kutakrock.com

Exhibit E

Pursuant to Rule 34 of the Federal Rules of Discovery, please respond to the following Requests for Production of Documents.

INSTRUCTIONS FOR ANSWERING

Scope. In answering these requests, you are required to furnish all information that is available to you or subject to your reasonable inquiry, including information in possession of your attorneys, accountants, advisors, or other persons directly or indirectly employed by or connected with you or your attorneys, and anyone else otherwise subject to your control. Moreover, you must make a diligent search of your records and other papers and materials in your possession or available to you or your representatives.

Missing Documents. In the event that any document or tangible thing requested to be identified has been destroyed or otherwise disposed of since its preparation or receipt, set forth the author, addressee, indicated or blind copies, date, numbers of pages, attachments or appendices, all persons to whom distributed, shown or explained, present custodian, the time, the place, the manner of destruction or disposition, the persons involved in the destruction or disposition and the general description of the document or tangible thing.

Supplementation. These requests are of a continuing nature requiring you to serve timely supplemental answers to the maximum extent authorized by law, setting forth information within the scope of these requests, which may be acquired by you, your attorneys, investigators, agents, employers, or others employed by you or acting on your behalf.

Privileged Documents. For all documents or information withheld on the grounds of privilege, provide (a) the paragraph to which the information or document is otherwise responsive; (b) its general subject matter; (c) the date or time period to which the information refers; (d) the source of the information; (e) any persons to whom such information or document has been sent; (f) the identity of every person who has received or in any way been given access to the information or document; (g) the identity of the person from whom the privilege purportedly derives, including the address and telephone number of the person or persons supplying any information considered privileged or confidential.

Production of Documents. In accordance with the Federal Rules of Civil Procedure, the documents are required to be produced as they are kept in the usual course of business or organized and labeled to correspond to each category of documents requested. All file folders, tabs, and other means of collection or storing are required to be produced along with the documents. Please do not produce documents without clearly indicating to which request they correspond. Documents should be produced at Carlson & Burnett LLP, 17525 Arbor Street, Omaha, NE 68130, unless agreed otherwise.

DOCUMENTS REQUESTED

REQUEST NO. 1: All documents referred to, identified in, or used to provide answers to Plaintiff's First Set of Interrogatories to Defendant Goodwill Industries, Inc. ("Goodwill").

RESPONSE:

REQUEST NO. 2: Plaintiff's complete personnel file, including but not limited to, any documents, records, memoranda, notes, or computer printouts which were part of Plaintiff's personnel file at any time.

RESPONSE:

REQUEST NO. 3: All documents not included in Plaintiff's personnel file which support, evidence, relate to or otherwise pertain to Plaintiff's employment with Defendant, including, but not limited to, documents relating to or reflecting job performance, awards to Plaintiff, or discipline of Plaintiff.

RESPONSE:

REQUEST NO. 4: All Employee Handbook(s) in effect at Goodwill during the period of Plaintiff's employment at Goodwill.

RESPONSE:

REQUEST NO. 5: All documents that you contend support each of your defenses or affirmative defenses.

RESPONSE:

REQUEST NO. 6: Any written or recorded statements from Defendant, its current and/or former employees, contractors, representatives or agents, concerning the allegations and defenses of this case.

RESPONSE:

REQUEST NO. 7: Any written or recorded statements concerning the allegations and defenses of this case received by Defendant from any third party pursuant to Defendant's subpoena or Freedom of Information Act ("FOIA") request.

RESPONSE:

REQUEST NO. 8: All documents Goodwill received from, sent to, or which otherwise refer to Plaintiff during her employment at Goodwill, including but not limited to:

- (a) Attendance records;
- (b) Performance appraisals/reviews;
- (c) Disciplinary action(s);
- (d) Payroll records;
- (e) Medical leave;
- (f) Commendations

RESPONSE:

REQUEST NO. 9: All documents that support, evidence, relate or otherwise pertain to any and all personnel policies of Defendant in effect from August 10, 2004 to the present, including but not limited to:

- (a) Employee discipline policies, including but not limited to, counseling, written warnings, suspension, demotion, and termination policies;
- (b) Sexual harassment policies;
- (c) Internal complaint or grievance procedures;
- (d) Equal Employment Opportunity (EEO) policies

RESPONSE:

REQUEST NO. 10: All documents which support, evidence, relate to, or otherwise reflect any Family Medical Leave Act ("FMLA") leave taken by Plaintiff during her employment at Goodwill.

RESPONSE:

REQUEST NO. 11: All documents which support, evidence, relate to, or otherwise reflect any disability accommodation requested by Plaintiff during her employment at Goodwill.

RESPONSE:

REQUEST NO. 12: All documents which support or evidence compensation paid to Plaintiff during her employment, including but not limited to, salary, bonuses, and commissions.

RESPONSE:

REQUEST NO. 13: All documents which support or evidence employee benefits provided to Plaintiff during her employment, including but not limited to, a description of plan benefits and/or plan handbooks, or pamphlets for profit-sharing plans, medical and dental insurance retirement benefits and life insurance.

RESPONSE:

REQUEST NO. 14: All documents which support, evidence, relate to or otherwise pertain to any lawsuits, complaints, charges, or claims of sex discrimination made against Defendant Goodwill (other than those filed by Plaintiff) from August 2004 to the present.

RESPONSE:

REQUEST NO. 15: All documents which support, evidence, relate to or otherwise pertain to any lawsuits, complaints, charges, or claims of disability discrimination made against Defendant Goodwill (other than those filed by Plaintiff) from August 2004 to the present.

RESPONSE:

REQUEST NO. 16: All documents which support, evidence, relate to or otherwise pertain to any lawsuits, complaints, charges, or claims of retaliation for reporting disability discrimination made against Defendant Goodwill from August 2004 to the present.

RESPONSE:

REQUEST NO. 17: All documents which reflect or set forth Plaintiff's job duties and responsibilities during her employment.

RESPONSE:

REQUEST NO. 18: All documents you intend to use at trial that are not responsive to any other Request.

RESPONSE:

Date: December 16, 2015.

LAURA A. DUHIGG, Plaintiff,

By: s/ Terry A. White
Terry A. White, NE # 18282
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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I certify that on December 16, 2015, I served the foregoing on Defendant's Counsel via e-mail at the following address:

Marcia A. Washkuhn
KUTAK ROCK LLP
The Omaha Building
1650 Farnam Street
Omaha, NE 68102
marcia.washkuhn@kutakrock.com

s/Terry A. White
Terry A. White